

BDCP RDEIR/SDEIS Review Document Comment Form

Document: Administrative Draft—Chapter 11- Fish 01

Comment Source: NMFS

Submittal Date: April 15, 2015

| No. | Page | Line # | Comment | ICF Response |
|-----|---------|--------|---|--------------|
| 1 | 83-84 | | This is a nice new addition that seems somewhat reasonable. I think it would have been better to get agency input on whether or not 15% change in key months was the appropriate threshold to determine significance but all in all a very good improvement to explain methodology used to assess impacts/benefits. | |
| 2 | 85 | | What is meant by N Delta entrainment B PJ? | |
| 3 | 85 | | Migration conditions should be focused on the Delta and not be given equal weighting with upstream which is mostly accounted for under “rearing” flows/habitat. DPM should not be the only method used to assess changes in migration habitat. This was commented on many times and we have flow-survival relationships that allow a more transparent method to assess impacts to migratory conditions. DPM use alone is not adequate and will lead to misleading results. We need to include a basic flow survival relationship and using monthly timestep should be sufficient enough to detect trends in migration effects between the Alternatives. | |
| 4 | 88 | | Same old story of dismissing the flow changes that we have the most scientific literature on – Delta outflow for sturgeon. This should be integrated into the migratory section for sturgeon. | |
| 6 | 54-64 | | Would be good to get a chance to corroborate the details added regarding underwater noise. Seems like a useful addition to review. | |
| 7 | General | | The Perry and Newman methodology is listed as a method available but in Table 11-17 it is not listed under Chinook migration. NMFS relies on this methodology and would be a necessary part of any Alternative assessment even if done on monthly time-step for the EIS Alternatives. | |
| 8 | general | | Not enough time to review | |
| 9 | General | | The new methodology is stated on pages 83-84 in this revised document but did it get applied to the previous results? I don't see any changes in impact determinations for any of the Alternatives here. | |

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